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15
16 UNITED STATES DISTRICT COURT
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18 NORTHERN DISTRICT OF CALIFORNIA
19
20 SAN FRANCISCO DIVISION

21 GOOGLE LLC,
22 Plaintiff,
23
24 vs.
25 SONOS, INC.,
26 Defendant.

27 CASE NO. 3:20-cv-06754-WHA
28 Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF LANA ROBINS IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
OPPOSITION TO SONOS, INC.'S
MOTION TO REALIGN THE PARTIES**

1 I, Lana Robins, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing
 4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this
 5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Google’s Administrative Motion to File Under
 7 Seal Portions of its Opposition to Sonos, Inc.’s Motion to Realign the Parties (“Opposition”). If called
 8 as a witness, I could and would testify competently to the information contained herein.

9 3. Google seeks an order sealing the materials as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Google’s Opposition	Portions highlighted in green	Google
Exhibit 1 to the Declaration of Jocelyn Ma in Support of Google’s Opposition (“Exhibit 1”)	Entire document	Google

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1 4. The portions of Google’s Opposition highlighted in green and Exhibit 1 contain
2 information about a confidential, non-public, and/or unexecuted agreements between Google and
3 Sonos that Google has designated “CONFIDENTIAL” under the Stipulated Protective Order. The
4 terms and specifics of Google’s licensing agreements is confidential information that Google does not
5 share publicly. The specifics of how these functionalities operate is confidential information that
6 Google does not share publicly. Thus, public disclosure of this information would harm Google’s
7 competitive standing in future negotiations by allowing competitors access to confidential information
8 that Google does not have similar access to about its competitors. I also understand that a less
9 restrictive alternative than sealing these exhibits would not be sufficient because the information
10 sought to be sealed is Google’s confidential business information but is necessary to Google’s
11 Opposition.

I declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge the foregoing is true and correct. Executed on February 21, 2023, in Mill Valley, California.

By: /s/ Lana Robins
Lana Robins

ATTESTATION

I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Lana Robins has concurred in the aforementioned filing.

DATED: February 21, 2023

/s/ Charles K. Verhoeven
Charles K. Verhoeven